

March 24, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Submission, WC Docket Nos. 09-197, 11-42

Dear Secretary Dortch:

On March 23, 2017, Danielle Frappier and Christopher Cook of Davis Wright Tremaine LLP, and Stan McCright and Saul Ramirez of Global Reconnect, Inc. (“GRI”) and TerraCom, Inc. (“TerraCom”), met with Amy Bender, Wireline Advisor to Federal Communications Commission (“Commission”) Commissioner O’Rielly.

During our meeting with Ms. Bender, Mr. McCright and Mr. Ramirez highlighted GRI’s recent acquisition of TerraCom, an eligible telecommunications carrier (“ETC”) that has served the low-income population in the Lifeline program since the early 2000s, and now provides high-quality wireless voice, text, and broadband services in twenty-one states. Under GRI’s new ownership, TerraCom is poised to utilize its increased resources to provide focused broadband service to qualified low-income consumers, businesses, and community partners in the areas that it serves. Furthermore, TerraCom’s track record of innovation sets it apart as a nimble competitor in the marketplace. To that end, Mr. McCright and Mr. Ramirez discussed TerraCom’s plans to offer facilities-based broadband services to government-subsidized housing.

I discussed that TerraCom will be updating and refiling its petition for designation as an ETC in ten of the federal jurisdiction states.¹ TerraCom’s new ownership, its focused Lifeline-supported broadband service offerings, and commitment to transparency around all aspect of its operations warrant renewed consideration from the Wireline Competition Bureau’s (“Bureau”). In light of the Bureau’s decision to revoke all previously granted Lifeline Broadband Provider

¹ See TerraCom, Inc. Amended Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, The Commonwealth of Virginia, and The District of Columbia, WC Docket No. 09-197 (filed Apr. 18, 2012) (“Ten State Petition”).

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Eligible Telecommunications Carrier (“LBP ETC”) designations,² and its lack clear guidance on how the Bureau will proceed during its “further review and analysis” of the pending LBP ETC petitions,³ TerraCom is hopeful that the Bureau will give TerraCom’s Ten State Petition new consideration.

I also explained that a state-by-state designation process for providers focused on provisioning Lifeline-supported broadband will be ineffective in achieving the goals articulated by the Commission in the *Lifeline Modernization Order*.⁴ A state-by-state designation process will be extremely lengthy, expensive, and inefficient in fostering the deployment and availability of broadband. I respectfully requested that the Bureau once again begin designating LBP ETCs as the Commission ordered in the *Lifeline Modernization Order*,⁵ but I also discussed the idea of a multistate-ETC petition process that a provider could utilize to apply for ETC designation across multiple states at once.

Lastly, I discussed Mr. Ramirez’s nomination to the Commission’s Broadband Deployment Advisory Committee. I highlighted that Ramirez is an excellent candidate to serve on the Committee. He brings a wealth of experience that will serve the Committee well in meeting the outlined objectives. Prior to joining GRI, he delivered 15 years of exemplary service as the CEO of the National Association of Housing & Redevelopment Association, the largest organization of approximately 20,000 housing and community development agencies and officials throughout the United States that administer a variety of affordable housing and community development programs at the state and local level. In addition, Mr. Ramirez served as the Deputy Secretary for the Department of Housing and Urban Development (“HUD”), and as HUD’s Assistant Secretary of Community Planning and Development in the mid-90s. Since that time, Mr. Ramirez has assisted various administrations from both parties, and has crafted national policy and program activities that relate to economic development and housing efforts.

² See *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, Order on Reconsideration, DA 17-128 (rel. Feb. 3, 2017) (“Revocation Order”). TerraCom submitted a petition for designation as a LBP ETC on December 15, 2016, and is eager to provide focused Lifeline-supported broadband service as an LBP ETC. Petition of TerraCom Inc. for Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier, WC Docket No. 09-197 (filed Dec. 15, 2016) (“TerraCom Petition”).

³ Revocation Order at para. 14.

⁴ *Lifeline Modernization Order*, 31 FCC Rcd at 3972, para. 30.

⁵ See *id.* at 4063, para. 274.

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed via ECFS.

Respectfully submitted,



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cc: Amy Bender